RENEWAL FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Coating Applications, Inc.

Attn: Don Clemente 2671 United Lane

Elk Grove Village, Illinois 60007

Application No.: 90120028 I.D. No.: 043440AHH

Applicant's Designation: COATING Date Received: May 29, 2003

Subject: Coating Operation

Date Issued: Expiration Date:

Location: 2671 United Lane, 1350 Lively Boulevard, Elk Grove Village

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a make-up air unit, three spray paint booths (one oven) with filters, two batch spray booths (one oven) with filters, a paint storage room, a burn-off oven and a powder coating line pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 25 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year, and a combination of such HAPs to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. Emissions and operation of the 5 pain spray booths and paint storage room shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Ton/Mo) (Ton/Yr)	(Ton/Mo)	(Ton/Yr)
All Coatings, Thinners, and Clean-Up Solvents	2.8	22.3	2.8	22.3

- These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- 3a. The Permittee shall not apply coatings to the miscellaneous metal parts or products on the coating lines unless the daily-weighted average VOM content does not exceed 2.8 lbs/gal, pursuant to 35 Ill. Adm. Code 218.205(b).
- b. Compliance with Special Condition 3a must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(d).
- c. This permit is issued based on negligible emissions of particulate matter from the 5 spray pain booths. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 4a. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

			Emission		
Fuel Usage			Factor	sions	
(mmscf/Mo)	(mmscf/Yr)	Pollutant	(Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
4.4	35.0	NO_x	100	0.3	1.75
		CO	84	0.26	1.5
		MOV	5.5	0.02	0.1

These limits are based on maximum fuel usage and standard AP-42 emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel(s) fired in the fuel combustion equipment. Use of any other fuel will require a revised permit.
- 5. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- 6. This permit is issued based on negligible emissions of particulate matter and volatile organic material from the power coating line with burn-off oven. For this purpose, emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 7a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.

- i. The Permittee shall collect and record all of the following information each day for each coating line:
 - A. The name and identification number of each coating as applied on each coating line;
 - B. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line; and
 - C. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.105.
- ii. Natural gas usage (mmscf/mo and mmscf/yr).
- iii. Usage of powder coating (tons/month and tons/year).
- iv. VOM and HAP emissions (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 8. The Permittee shall notify the Illinois EPA in the following instances:
 - a. Any record showing violation of 35 Ill. Adm. Code 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - b. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.211 from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the Permittee shall comply with all requirements of 218.211(c)(1) or (e)(1), respectively. Upon changing the method of compliance with this 35 Ill. Adm. Code 218.211 from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the Permittee shall comply with all requirements of 35 Ill. Adm. Code 218.211(c) or (e), respectively.
 - c. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

<u>and</u> one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

- 10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. The name and identification number of each coating as applied on each coating line (daily);
 - b. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - c. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104; and
 - d. VOM and HAP emissions (tons/month and tons/year).

It should be noted that the parts cleaning system is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(00).

It should be noted that this permit has been revised to include operation of the equipment described in construction permit 99090011.

It should be noted that the facility on 1350 Lively Boulevard, Elk Grove Village is considered a support facility of the facility on 2671 United Lane, Elk Grove Village, as defined in Section 39.5 of the Environmental Protection Act. For these purposes, these two facilities will be considered the same emission source.

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If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1

Illinois EPA, Compliance Section

USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is using less than 22.3 tons per year of VOM in the coatings, thinners, and clean-up. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material, 10 tons per year of any individual hazardous air pollutants (HAPs), and 25 tons per year of a combination of such HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less coating is used or a lower VOM content material is used and control measures are more effective than required in this permit.

1. Emissions from the 5 paint spray booths and paint storage room:

	VOM Usage		VOM Er	VOM Emissions	
<u>Material</u>	(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)	
All Coatings, Thinners,					
and Clean-Up Solvents	2.8	22.3	2.8	22.3	

- This permit is issued based on negligible emissions of particulate matter from the 5 pain spray booths. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.1 ton/year.
- 3. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

			Emission	
	Usage		Factor	Emissions
(mmscf/Mo)	(mmscf/Yr)	<u>Pollutant</u>	(Lb/mmscf)	(Ton/Mo)
(Ton/Yr)				
4.4	35.0	NO√	100	0.3
1.75	33 . 0	IVO _X	100	0.5
1.70		СО	84	0.26
1.5			-	
		VOM	5.5	0.02
0.1				

- 4. This permit is issued based on negligible emissions of particulate matter and volatile organic material from the power coating line with burn-off oven. For this purpose, emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 5. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the

emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section $112\,(G)$ of the Clean Air Act.

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